UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

OCT 19 1987

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FOR REVIEW.
RETURNED BY STATE
ISSUES: ENF. LANGUAGE
HEALTH BASED STD. VS RCG STD. FOR CLOSURE
SUBMITTED PART B SO NO FED. ENF. LANGUAGE

Mr. John G. Whitehead, Plant Manager
United Technologies Pratt & Whitney
400 Main Street
East Hartford, CT 06108

Re: Comments on the Revised Burn-Zol Hazardous Waste Incinerator Closure Plan, United Technologies Pratt & Whitney East Hartford, Connecticut CTD990672081

Dear Mr. Whitehead:

As a result of the review of your resubmitted incinerator closure plan, dated January 16, 1987, we offer the following comments:

° The plan only addresses the characteristic nature of the wastes (40 CFR Part 261 Subpart C). Your Part B permit application indicates that some of the wastes incinerated were listed (identified in §261 Subpart D). Consequently, the proposed analytical activities are not sufficiently comprehensive. You need to include analysis of the listed hazardous wastes and appropriate hazardous waste constituents to those already proposed.

° Scrape samples of refractory brick only allow you to analyze for surface and near surface contamination. EPA believes that it is more appropriate to take core samples of the refractory for analysis.

° Both of the above points are critical in demonstrating that the decontaminated refractory brick is not hazardous waste and can be legally and appropriately disposed of as solid waste in a municipal landfill as proposed. The demonstration required differs from that proposed in the submitted closure plan.

° For both a listed and characteristic hazardous waste, the mixture rule applies (40 CFR Part 261.3(c)). The mixture rule specifies that any hazardous waste mixed with a solid waste results in the mixture being considered a hazardous waste unless the mixture no longer exhibits any hazardous waste characteristics and the hazardous waste in the mixture was only characteristically hazardous.

Refractory brick removed and intended for disposal is considered solid waste. When in place, the refractory brick was exposed to hazardous waste[1], both of a characteristic and listed nature. Consequently, a determination of "non-hazardousness" of the refractory requires that:

1) A demonstration of total absence of any listed hazardous waste (and hazardous constituents) and a level of hazardous waste characteristic properties below those specified in §261 Subpart C be made;

2) A demonstration that levels of listed hazardous waste (and hazardous constituents) and levels of characteristic hazardous waste properties present existed in the "virgin" refractory be made; or

3) The refractory is delisted as specified in 40 CFR Part 260.22. This is a formal procedure that is conducted through the Office of Solid Waste at EPA in Washington, D.C.

° The utilization of a wipe test in determining that the exposed and uncovered metal surfaces are not contaminated, is not sufficiently explained in the plan. A useful reference would be the "Guide for Decontaminating Building Structures and equipment at Superfund Sites" (EPA publication PB 85/201234 by HWERL) which may provide the necessary detail for describing a comprehensive wipe test protocol.

In addition to the above comments, there were some comments discussed with Mr. K. Vidmar by phone on March 15, 1987. These comments are listed below

° There need to be two separate sets of wipe tests for the analysis that was proposed in the revised closure plan, one set for CN^- and another set for metals. There will likely be additional wipe samples necessary to address the listed nature of the wastes used to demonstrate that decontamination has been completely effective.

° There is no description of the decontamination activities for the equipment attached to the incinerator train (blowers and burners). (Were they steam cleaned and tested?) In addition, there are access doors that are apparently lined with refractory and are sealed with asbestos gaskets. What are the decontamination activities that will be undertaken for them?

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[1] EPA recognizes an incinerator as a treatment system and the effluent flow if it meets the DRE and other parameters specified by license as non-hazardous waste. The incinerator train through the final treatment process (i.e., scrubber) is exposed to hazardous waste. In this case, the effluent did not meet specified destruction/removal standards and, therefore, the stack is also considered to have been exposed to hazardous waste.

- Mr. Vidmar indicated that the incinerator will be disassembled, then sampled and decontaminated. This information should be included in the plan. In addition, the ~~location that will be used for decontamination, and~~ a description of the steps taken to prevent contamination and effect clean-up ~~of this area should be included in the plan.~~ for the location where incinerator disassembly will occur.
- Please provide ~~a~~ protocol for disposal of the condensate from the steam cleaning operations.
- This closure plan appears to constitute a partial closure plan for the CWTP and that fact should be stated in the plan. This will preclude any questions about why the surrounding areas are not being addressed in this plan.

- When removal of ash and the refractory occurs we recommend some dust suppression technique be employed (such as wetting the ash down) and the chosen technique be written into the closure plan.

- Please describe the composite analysis strategy more fully for the refractory samples (i.e., which samples were/will be in which composites).

- If any additional samples of stained refractory are taken, they should be analyzed individually, to ensure that those areas which may be contaminated are not diluted through the analysis of sample compositing.

- Although the unit was operated at a negative pressure, and for a short period of time, EPA recommends that Pratt demonstrate that the outside of the unit is not contaminated. This could be accomplished by analyzing the shell through the use of wipe tests in various locations. A more definitive statement could then be made on page 8 of 13 of the closure plan.

- Page 6 of 13, item 3 describes the flushing of line that fed hazardous waste to the incinerator. Part of that process is a description of the use of process water as the final step of the flushing. According to the plan, the preceding flushing fluids will be treated as hazardous waste, however the plan does not indicate what will happen to the process water if when tested is found to be hazardous.

If you have any questions about the above comments please contact us.

Enf. language inappropriate because not a final closure state language could be used?

Sincerely,

Arthur Wing
Environmental Engineer
US EPA
(617) 223-1910

George Dews
Senior Sanitary Engineer
CT DEP
(203) 566-2264

cc: J. Murray

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United Technologies Pratt & Whitney
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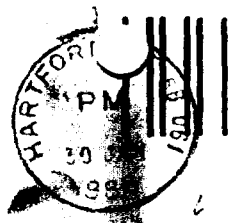

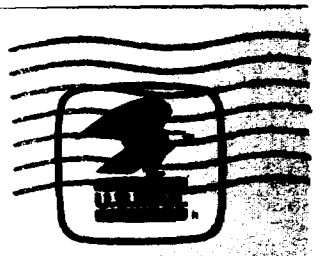

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P-624 562 972

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